



# Wyoming Department of Agriculture

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June 07, 2005

Chris Burkett  
Wyoming Game and Fish Dept.  
5400 Bishop Boulevard  
Cheyenne, WY 82006-0001

Dear Mr. Burkett:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Wyoming Game & Fish Department (WGFD) Draft Comprehensive Wildlife Conservation Strategy (CWCS).

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We support the efforts of the WGFD for the taking the lead on the development of the CWCS. Wildlife are important to the citizens and state of Wyoming and the CWCS has the possibility of guiding agencies and organizations in their research endeavors in a consistent manner. We do not have specific comments or recommendations related to Appendix II, but we do ask for you to consider the following comments.

### **Benefits of Agricultural Land**

Agriculture is important to not only provide food for the people of the world, but also the wildlife. Farming and ranching is repeatedly blamed for the demise of wildlife, but what the CWCS document and many people's beliefs fail to recognize is that agricultural land is vital to the success of all wildlife including insects, birds, rodents, predators, and large game. Agriculture producers continue to maintain open spaces, create water developments, plant shelterbelts, which in the end provide the food, water, and shelter, necessary for wildlife. We will provide a number of citations, proving agriculture can benefit wildlife and we ask for you to consider and incorporate these citations into the CWCS document.

### **Section I**

The Executive Summary states "The Wyoming Game and Fish Department (WGFD) served as the lead agency in the development of this strategy, but over 30 other partners were actively involved." We believe this statement is misleading to the US Congress and the State Wildlife

Grants committee. The WGFD is very much the sole agency with some additional sideline support from other agencies. The committee should not be coaxed to believe all agencies are on board, when in fact, most of the "partners" are simply commenting, but not actively involved in the day-to-day creation of the document. There should be more of a group process involved in the development of this document if the 30 listed "partners" are truly partners.

The development of the species of greatest conservation need (SGCN) is also misleading and could be abused by environmental organizations who continue to abuse the Endangered Species Act and use litigation to tie up the decision making process. The list of SGCN does not include invertebrate species at this time, but will be included in the 2010 document. We believe this along with the listing of animals with no scientific data is an error. The insects and animals lacking data, should be separated and not intertwined into the species that really need conservation actions taken.

## **Section II**

We believe it to be erroneous adding the white-tailed prairie dog, black-tailed prairie dog, and prairie rattlesnake to your list. Wyoming does not have the loss of habitat other states may have for these animals and they should not be included. All three animals are routinely removed due to high populations and in the case of prairie dogs, forage reduction and rangeland degradation. We request the WGFD remove these animals and review the list for other species which may have a high population in Wyoming and not base the decision on Federal listings.

## **Section III**

The list of problems and threats to Wyoming SGCN is used in tabular form and narrative form. Many of the problems and threats are addressed in narrative form, but many of them are missing. We would like the WGFD to address how unregulated take/mortality and predation affect SGCN and how your agency will be able to address these two topics. Predation can be detrimental for all animals, both wild and domestic.

## **Section IV**

Section four states there are 235 out of 278 animals listed, simply due to the lack of data. This is 85% of your overall total. There is clear evidence for a need to have a separation between your "true" species of need and those that warrant future research to add to the Natural Diversity Database (NDD). This list should be shared with university students who are interested in projects for graduation requirements. Other researchers may also be interested in a particular species and can choose from this list.

A statement on page 53 states "Agricultural conversions, especially those that are unsuccessful and those that create monotypic stands of vegetation, tend to reduce biological diversity and reduce the quality of that habitat for many SGCN." We strongly disagree with this statement, as cropland and vegetative conversions have been significantly beneficial in increasing populations of waterfowl, upland game birds, deer, and predator species. Your document states seven percent of Wyoming's land has been converted from native ecosystems. Don't assume all conversions are agricultural.

Page 55 states, "Paige and Ritter (1999) found that in the western United States, approximately 10 percent of the native sagebrush steppe has been completely replaced by invasive annuals or seeded to non-native grasses." This information is much too broad for a statewide document and should be removed. We recommend you avoid lumping Wyoming in with states such as Oregon, Washington, or Idaho, where conversion may have played a larger percentage in removing sagebrush.

A second statement on page 55 says "In some areas of the state, big sagebrush is still considered a weed that reduces grass and forb production for livestock and is actively eradicated." Sagebrush is being controlled, and according to many agencies, decadent sage is a reason for the reduced population of sage grouse, pygmy rabbit, or other species reliant upon sagebrush. A mosaic of different ages of sagebrush, plus open areas, grasses, and forbs are all important in improving sagegrouse and pygmy rabbit habitat. This also benefits livestock production and should be encouraged in the future.

The statement on page 59 says "Salvage logging following wildfires may negatively affect some wildlife species (such as lynx and lynx prey) and overall forest productivity if most large diameter trees are removed." This is an opinion and not a fact. The statement should have a reference based on research.

A contradiction in regards to sagebrush is on page 61, where "inappropriate livestock use and wildlife grazing/browsing have in some areas contributed to dense, old, monotypic stands of big sagebrush, reduction of herbaceous under stories, and simplification of community diversity." We do not believe livestock create a decadent, monotypic stand of big sagebrush, but rather the lack of fire, cost of spray treatment, etc. are the reasons why stands are monotypic and decadent. Again, we ask for references in regards to your statements. This is clearly another opinion, and not referenced.

Page 64 states "Although there are over 91 species of breeding birds and 25 species of mammals strongly dependant on these systems in Wyoming, 27 SGCN birds and 20 mammals are especially dependant on these systems are identified in the following list." The above listed animals should not be taken from the SGCN, since you lack the data for 85% of those species.

Finally, on page 66, "Return irrigation water is often silty and may carry pollutants such as fertilizers, herbicides, and pesticides." Again, we ask for the WGFD to make references which back their statements and not base the document on opinions or words like "may."

#### **Section IV**

The Definitions of Conservation Action Codes Used in Tables 31 through 37, should be in the same order as the previous tables.

#### **Section V**

We would like the CWCS to be able to guide researchers in a specific direction based on species' needs, not organization needs. There is a lack in communication between agencies, organizations, and the university as to what species are currently being researched, what the

focus of the study is, what has been done in the past, and more. Wildlife advocacy organizations routinely do "research" and create the need to list a species, or only reveal the information they find is to their advantage. We highly encourage open communication between researchers and discourage the need to replicate a study in order to offset one-sided research.

#### **Section VI**

The WGFD should work primarily with the Natural Diversity Database (NDD) to create consistent, well documented, neutral research. The data received should be organized with NDD so a list can be created of the areas missing for a particular species and additional research can be directed appropriately and avoid duplication. This will also assist in the compilation of material when the 2010 review period comes.

#### **Section VII**

We suggest using the Section VII breakout between partners and stakeholders, plus the definitions of each be used in Appendix I. The listed partners and stakeholders should be continually kept informed of the research projects in progress as well as the need for research to complete a species listing.

#### **Section VIII**

The WGFD website should have a link to all partners and stakeholders to direct those interested with a "needs" section. Again, we recommend using university students to help fulfill some of the research project needs.

#### **Citations of Agriculture Benefiting Wildlife**

This small sample of citations is just an example of research proving agriculture can positively benefit wildlife. We ask the WGFD to use these citations in the CWCS and seek guidance from the WDA for additional research if necessary. While not all of these sources are Wyoming research, the crops, methods, and wildlife will be found across our state.

- 1) Contributions of Alfalfa to Wildlife and the Environment. Dan Putnam, Extension Agronomist, Department of Agronomy and Range Science, University of California Davis. 1998. <http://www.calhay.org/paper.html>
  - a) "The unique characteristics of alfalfa contribute significantly to broader societal goals, such as preservation of wildlife habitat, improvement of soil tilth and soil organic matter, for reducing fuel requirements of agriculture, as an insectary for beneficial insects and as a habitat for many species of wildlife."
  - b) Although steps can be taken by growers to improve interactions between forage production and wildlife (such as protection of nesting waterfowl), alfalfa should be more broadly recognized by the general public for its diverse benefits, and for its fundamental contribution to the long term sustainability of agricultural systems and to improved wildlife habitat."
  - c) "There is a widespread assumption among those who are most vocal about environmental issues that if land is allocated for agriculture, it is lost for wildlife habitat or environmental preservation. To them, it appears that agriculture is always a 'negative' environmentally."

- d) "Alfalfa in particular provides a number of important contributions which should be considered of value to the goals of cleaner air and water, better habitat for wildlife, and more judicious use of resources. As the United States and the world face ever rising urban populations, the value of agriculture, and alfalfa in particular, in maintaining open spaces for wildlife and other important functions should be increasingly recognized."
  - e) "In the late 20<sup>th</sup> century, it is no longer sufficient to produce excellent quality food products, but to communicate to a skeptical public that farmers are good stewards of the land and will take steps to further protect the land, water, and wildlife."
  - f) "However, each successive regrowth of alfalfa creates an environment which teems with insect life. The numbers and kind of insects that inhabit alfalfa have been described as "incredible" (Manglitz and Ratcliffe, 1988)."
  - g) "Insects are so abundant in alfalfa fields that university entomology classes can often be found sweeping in alfalfa fields to study the diversity of insects to be found there."
  - h) "Agriculture activities interact significantly with wildlife on several different levels, and many forms of wildlife adapt, adjust or even thrive within and alongside agriculture."
- 2) Estimating Wildlife Habitat Trends on Agricultural Ecosystems in the United States.  
Stephan J. Brady and Curtis H. Flather (USDA, NRCS, Ft. Collins, CO.) 2001.
- a) "Cropland, pasture and rangeland all exhibited net declines during the period 1992 – 1997 while forest and developed land both increased. These net changes are the result of many local changes and land use shifts to and from each land use category. For example, although the net change in cropland was -2,141,100 hectares, this was the result of converting 17,180,500 hectares of cropland in 1992 to other land uses in 1997, while converting 15,039,400 hectares of other land uses to cropland in 1997. Hence the effect on wildlife habitat is substantial as 32,219,900 hectares are involved in land use changes centered on cropland."
  - b) "We believe it is important to recognize and receive credit for national policies resulting in these small, but perhaps extensive, improvements to habitat condition. The approach to habitat indicators should incorporate all agricultural land and not just the most valued agro-ecosystems."
  - c) "The Conservation Reserve Program (CRP) has been one of the most beneficial programs for wildlife habitat in the U.S."
  - d) "Nearly 9.5% of the nation's cropland was enrolled in perennial vegetative cover for 10-year contracts. The combined size of the new wildlife habitats created by the CRP was twice as large as the National Wildlife System and all state-owned wildlife areas in the contiguous 48 states combined (USDA Farm Service Agency Online). Recruitment of grassland nesting birds, many waterfowl species, and other wildlife have shown improvements, some of which are attributable to the CRP. Wildlife was one of many environmental benefits resulting from the CRP."
  - e) "The beneficial effects of habitat elements occurring on agricultural fields (e.g., field margins of beneficial perennial vegetation, hedgerows, etc.) are directly dependent upon the landscape setting, particular ecological region, and intensity of land uses. Studies of bird communities indicate that different measures of bird diversity respond differently to land use and land cover patterns leading us to conclude that multiple measures of wildlife community structure should be examined in assessing impacts from land intensification

- f) (Brady and Flather 1995). Empirical analyses of wildlife abundance with habitat attributes occurring on agricultural fields are confounded by other habitat attributes occurring across the landscape matrix. Consequently it is important to conduct empirical studies using measures of biodiversity with the full suite of landscape attributes.”
- 3) Black Bear Conservation Committee.  
<http://www.bbccc.org/habitatandmanagment/agriculturallands.htm>
- a) “While forestlands provide optimum bear habitat, agricultural lands, can be managed to enhance overall bear habitat quality. Use of various habitat management techniques on agricultural lands next to or interspersed with forested tracts can serve to improve and expand occupied bear habitat. Agricultural habitat management practices beneficial to bears could be as simple as crop selection or as intensive as the development of wildlife corridors or even the total conversion of marginal agricultural land to hardwood trees.”
- 4) Land Stewardship Project. [http://www.landstewardshipproject.org/programs\\_mba.html](http://www.landstewardshipproject.org/programs_mba.html)
- a) “Pasture-raised livestock systems and diverse crop rotations provide public benefits of improved water quality, reduction of flooding, enhanced wildlife habitat, reduced air pollutants, and reduced global warming potential. Farmers benefit through increased profit potential, taking pride in clean streams, and improved quality of life for the family. Communities benefit from scenic and healthy landscapes and more positive economic and social interactions between farms and community members. And finally, consumers purchase food that supports landscape, human and animal health.”
- 5) National Stewardship Initiatives: Conservation Strategies for U.S. Land Owners. Sara Vickerman. <http://www.defenders.org/pubs/nsi06.html>
- a) “Many agricultural practices are compatible with wildlife needs. For example, well-managed grazing operations leave substantial native vegetation in place for a variety of species and need not disrupt ecological processes. In many areas across the country, large mammals such as deer and elk find irrigated pastures attractive for feeding. Migratory waterfowl enjoy farm ponds, flooded fields, and unharvested grains during winter months. Songbirds frequent orchards and vineyards throughout the year. Flowering crops provide habitat for birds and pollinating insects. Raptors are often seen hunting rodents on farm fields.”
- b) “Beyond the obvious, however, agricultural lands are important to biodiversity for additional reasons.”
- c) “Agricultural lands also provide an important buffer-a transition zone- between wild and urban areas. Most agricultural lands have the potential to be restored to more natural conditions, unlike more intensively developed urban and industrial areas where natural habitat has been irrevocable altered.”
- 6) Soil and Water Conservation Practices Also Benefit Wildlife.  
<http://www.outdoorcentral.com>
- a) “Another often-overlooked benefit of no till agriculture is an increase in the quality and quantity of wildlife habitat, according to Barnes. Productive soils and crop residue provide better shelter and food for wildlife such as bobwhite quail. For the first two weeks of life, bobwhite quail chicks have an extremely high requirement for protein, which can be met through the consumption of insects.”
- 7) Shelterbelts for Wildlife. Melissa J. Santiago and Amanda D. Rodewald. Ohio State University. <http://ohioline.osu.edu/w-fact/0016.html>

- a) "Maintaining wildlife habitat or other natural areas can be a cost effective approach to land management. Planting a shelterbelt creates habitat for wildlife and provides the landowner with economical benefits as well. Shelterbelts guard fields and buildings by reducing exposure to wind. They lesson soil erosion, help retain moisture in the ground, and protect water quality."
- b) "Shelterbelts have long protected livestock from harsh weather conditions, but they also benefit many types of wildlife. A shelterbelt provides basic wildlife requirements: cover, space and even food. Birds such as mourning doves, northern bobwhites, ring-necked pheasants, and various species of waterfowl regularly roost, feed, and nest in windbreaks. Small mammals like the eastern cottontail rabbit will use windbreaks for cover. White-tailed deer take advantage of windbreaks, but may not find enough shelter for year-round usage."
- 8) Managing Agricultural Lands for Grassland Birds.  
[http://www.massaudobon.org/Birds\\_&\\_Beyond/grassland.agricultural.php](http://www.massaudobon.org/Birds_&_Beyond/grassland.agricultural.php)
- a) "Most grassland birds use hayfields, meadows, and pastures for breeding while many other birds nest nearby and use crop fields and open areas for hunting and foraging. Some species nest along weedy borders and shrubby edges of fields and rely on other fields for feeding on seeds and insects."
- b) Songbirds, such as bobolinks and eastern meadowlarks, build nests on the ground, raise young, and forage exclusively within hayfields, meadows, and pastures during summer. In the fall, fields provide food for migrating sparrows, larks, and warblers. Some songbirds that breed farther north, such as snow buntings, visit farm fields in search for food during the winter months. Many hawks and owls, such as American kestrels, northern harriers, and short-eared owls, rely on grasslands of all sizes for hunting small mammals. Waterfowl and shorebirds frequently feed in flooded portions of crop fields during migration."
- c) "Cattle, sheep, and horses have different food preferences; their grazing has effects on the different vegetation structures of pastures. Many grassland birds in the Northeast tolerate and benefit from light grazing because it creates a mosaic of grass heights and structures, removes ground litter, and benefits bunch grasses. Light grazing also allows the development of wildflower and scattered shrubs."
- 9) Biodiversity of Rangelands. Society for Range Management.
- a) Livestock can be used to actually enhance conservation of particular species or plant communities and structures."
- b) Moderate grazing and trampling usually increase the diversity of plants by decreasing the ability of any one plant species to become dominant and exclude other species. Grazing can create gaps in the plant community, making light, moisture and nutrients more available."
- c) If grazing is excluded, the number of species may increase in the short-term, but may decline in the long-term because the system that is less able to withstand other disturbances such as drought and fire. Rangeland professionals use a combination of management actions such as grazing and prescribed burning to enhance landscape diversity by creating patterns of different communities across the landscape. In addition, large tracts of land owned or managed by livestock operators can assist in protection biodiversity by maintaining contiguous habitat.

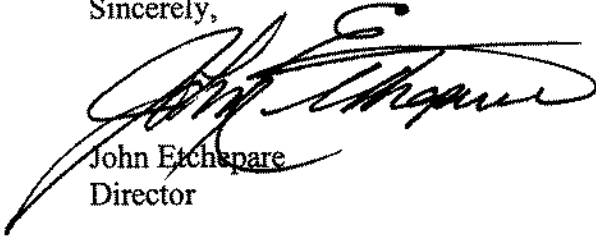
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WYGFD- GB Relocation Regulation

Page 8

We appreciate the opportunity to review and comment on the CWCS. We believe the document can be used in a positive manner to improve Wyoming's wildlife populations. We want to emphasize the need to review the document from all directions and look for the loopholes organizations might find to use this document in a negative manner. We look forward to reviewing the final document.

Sincerely,

A handwritten signature in black ink, appearing to read "John Etchepare", is written over the printed name and title.

John Etchepare  
Director

JE/jw

Cc: Governor's Planning Office  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board